

DSS:ZA  
F.#2012R00596

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**CR 13**

**527**

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ALHASSANE OULD MOHAMED,  
also known as "Cheibani,"  
  
Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§  
1111(b), 1113,  
1116(a), 1116(c),  
2 and 3551 et seq.)

THE GRAND JURY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Indictment, unless  
otherwise indicated:

BACKGROUND

1. William Bultemeier was a civilian employee of the  
United States Department of Defense and a retired United States  
Army Master Sergeant.

2. William Bultemeier was deployed to the United  
States Embassy in Niamey, Niger in July 2000. During this  
deployment, William Bultemeier served as the Defense Attache  
System Operations Coordinator.

3. William Bultemeier was scheduled to return home,  
to North Carolina, on December 23, 2000.

4. William Bultemeier was an internationally protected person as defined in Title 18, United States Code, Section 1116(b)(4)(B), entitled pursuant to international law to special protection against attack upon his person, freedom and dignity.

5. Christopher McNeely was a United States Marine Corps Staff Sergeant, stationed at the United States Embassy in Niamey, Niger.

6. Christopher McNeely was deployed to the United States Embassy in Niamey, Niger in October 2000 to serve as Marine Detachment Commander.

7. Christopher McNeely was an internationally protected person as defined in Title 18, United States Code, Section 1116(b)(4)(B), entitled pursuant to international law to special protection against attack upon his person, freedom and dignity.

#### THE ATTACK

8. On or about the evening of December 22, 2000, William Bultemeier, Christopher McNeely and other employees of the United States Embassy in Niamey, Niger patronized a restaurant known as La Cloche in Niamey.

9. William Bultemeier drove to the restaurant in a white Toyota Land Cruiser, bearing diplomatic license plates

indicating that the vehicle was registered to the United States Embassy (the "diplomatic vehicle").

10. In or around the early morning hours of December 23, 2000, William Bultemeier, Christopher McNeely and others exited the La Cloche restaurant.

11. As William Bultemeier approached the diplomatic vehicle, the defendant ALHASSANE OULD MOHAMED, also known as "Cheibani," and a co-conspirator accosted Bultemeier, brandishing a pistol and an AK-47 assault rifle. The defendant demanded that Bultemeier give him the keys to the diplomatic vehicle.

12. The defendant shot William Bultemeier in the chest with a pistol.

13. William Bultemeier fell to the ground, and Christopher McNeely ran to his aid.

14. The defendant's co-conspirator shot William Bultemeier and Christopher McNeely with an AK-47 assault rifle.

15. The defendant retrieved the keys for the diplomatic vehicle from William Bultemeier's pocket.

16. The defendant and his co-conspirator drove away from the scene in the diplomatic vehicle.

17. William Bultemeier died of the gunshot wounds he sustained in the attack.

18. Christopher McNeely survived the gunshot wounds he sustained in the attack, but suffered lasting injuries.

COUNT ONE

(Murder of an Internationally Protected Person)

19. The allegations contained in paragraphs 1 through 18 are realleged and incorporated as if fully set forth in this paragraph.

20. On or about December 23, 2000, within the extraterritorial jurisdiction of the United States, the defendant ALHASSANE OULD MOHAMED, also known as "Cheibani," together with others, did knowingly and intentionally kill an internationally protected person, which killing was a murder as defined in Title 18, United States Code, Section 1111(a), in that the defendant, together with others, with malice aforethought, did unlawfully kill William Bultemeier, an employee of the United States, in the perpetration of a robbery.

(Title 18, United States Code, Sections 1116(a), 1116(c), 1111(b), 2 and 3551 et seq.)

COUNT TWO

(Attempted Murder of an Internationally Protected Person)

21. The allegations contained in paragraphs 1 through 18 are realleged and incorporated as if fully set forth in this paragraph.

22. On or about December 23, 2000, within the extraterritorial jurisdiction of the United States, the defendant ALHASSANE OULD MOHAMED, also known as "Cheibani," together with others, did knowingly and intentionally attempt to kill an

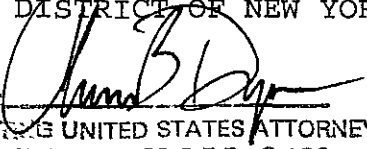
internationally protected person, which attempted killing was an attempted murder as defined in Title 18, United States Code, Sections 1111(a) and 1113, in that the defendant, together with others, with malice aforethought, attempted to unlawfully kill Christopher McNeely, an employee of the United States, in the perpetration of a robbery.

(Title 18, United States Code, Sections 1116(a), 1116(c), 1113, 2 and 3551 et seq.)

A TRUE BILL

FOREPERSON

LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

vs.

ALHASSANE OULD MOHAMED, also known as "Cheibani,"

Defendant.

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**INDICTMENT**

( T.18, U.S.C., §§ 1111(b), 1113, 1116(a), 1116(c), 2 and 3551 et seq.)

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*A true bill.*

Foreman

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*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

Clerk

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*Bail, \$* \_\_\_\_\_

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***Zainab Ahmad, Assistant U.S. Attorney (718) 254-6522***